

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Alcides Lucas Diaz and	:	No. 5:16-bk-02308-JJT
Adriana J. Diaz	:	
Debtor.	:	Chapter 13

**MOTION TO INCUR DEBT POST-PETITION**

AND NOW, comes the Debtor, by and through his/her attorney, Patrick J. Best, Esquire, of ARM Lawyers, who hereby moves this Honorable Court as follows:

1. The instant Chapter 13 Bankruptcy matter was filed on May 31, 2016.
2. The Chapter 13 Plan was confirmed on June 7, 2017.
3. The Debtor desires to purchase a house in an effort to save money.
4. Debtor has been renting his residence, but if this Motion is granted, Debtor can purchase a house which would result in a lower monthly housing expense.
5. Debtor has preliminarily obtained financing with Finance Of America Mortgage LLC in the amount of \$293,040.00 at 5.732% for a term of 360 months amounting to a monthly payment of \$2,236.99 (including taxes and insurances). See Exhibit A attached.
6. The Debtor will receive no funds directly from this Loan.
7. The Debtor believes that incurring the new indebtedness is necessary and proper in that results in reduced monthly expenses for the Debtors.
8. Debtors do not believe this will be a burden on their finances and are requesting the permission of this Honorable Court in order to execute this loan.

**WHEREFORE**, Debtor respectfully requests this Honorable Court to authorize the Debtor to incur the indebtedness described hereinabove in order to purchase a house.

Date: November 21, 2018

/s/ Patrick J. Best  
Patrick J. Best, Esq.  
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